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August 19, 2011

**VIA ECF & OVERNIGHT MAIL:**

Hon. Joseph Irenas, U.S.D.J.  
United States District  
Court for the District of New Jersey  
Post Office Building  
401 Market Street, 3<sup>rd</sup> Floor, Suite 310  
Camden, NJ 08101

RE: *Brady v. Air Line Pilots Association*  
Civil Action No. 02-2917

Dear Judge Irenas:

Enclosed please find a proposed consent briefing schedule for submission of opposition and reply briefs in connection with Defendant's Motion for New Trial, Motion for Judgment Notwithstanding the Verdict and Motion to Revoke the *Pro Hac Vice* Admissions of Allen Press and Joe Jacobson. If the form of Order meets with Your Honor's approval, the parties respectfully request you sign and enter the Order.

Respectfully submitted,

s/ Nicole M. Acchione

Nicole M. Acchione

Enclosures

cc: Steve Fram, Esq. (via ECF)  
Daniel Katz, Esq. (via ECF)  
Allen Press, Esq. (via ECF)  
Joe Jacobson, Esq. (via ECF)